

FAO Michael Reynolds
NYCC Planning Services

Paul Edwards
Selby DC Planning Services

Heritage Services

Growth, Planning and Trading Standards
Business and Environmental Services
North Yorkshire County Council
Northallerton
DL7 8AH

Your ref: Drax Repower Project
Our ref: 230709 Drax Landscape Strategy
Date: 23 July 2018

Contact: John Wainwright
Principal Landscape Architect
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Dear Michael and Paul

Landscape and Visual Impact Assessment (LVIA), Outline Strategy - Initial Comments

Further to our meeting at Drax Power Ltd on 12th July 2018 to discuss landscape issues, I have set out below some initial feedback and comment.

This project is significant because it will help secure the long term future of Drax Power Station. Key objectives are to increase reliable large scale capacity and ensure that Drax Power Station maintains its position as one of the UK's main power generators and to maximising efficiency of the power station (ES 4 – Consideration of Alternatives).

The main driving factor in determining the layout and design of the development seems to be efficiency rather than achieving a harmonious scheme in keeping with the original Power Station design or seeking to minimise local impacts on Selby (ES 4 – Consideration of Alternatives). The concern is that sufficient consideration is given to these.

Of particular concern is that a substantial quantity of adverse landscape and visual effects has been identified (moderate to major, negative, direct, permanent, long term) with almost no effective mitigation proposed (ES 18 – Summary of Significant Effects Table 18.6 and Table 18.6). The mitigation or enhancement described is either short term reinstatement work or is yet to be resolved through the Landscape and Biodiversity Strategy (LABS).

The development team have taken into account the original planting mitigation (A E Weddle scheme). This was designed and implemented in a different context more than 50 years ago and is insufficient to mitigate the proposed development alone. Every opportunity should be taken to reduce adverse effects and minimise impacts on visual amenity and impacts on the local community as far as reasonably practicable, in line with current national policy.

The Power Station is visible over a wide geographical area and the development's design should promote a positive image across the district. Landscape and visual mitigation should be substantive and reflect the scale, significance and likely lifespan of the development with consideration to sensitive receptors such as local residents and visitors to the local area. Business and Environmental Services ■

Review of Mitigation Opportunities

During the meeting on 12th July 2018, Drax Power Ltd and WSP described a review of land and mitigation but very few opportunities were identified. It was suggested that Drax Power Ltd should actively review all operational and non-operational land within their control in order to identify opportunities to mitigate the identified visual impacts.

The progress of mitigation opportunities will be important to review in advance of the meeting on 31st July which is to discuss the DCO and S106 agreement if other land and options are to be considered outside the red line area.

Drax Power Station falls within the Leeds City Region Green Infrastructure Strategy Area and objectives for the River Ouse catchment area. There may be opportunities to work with these strategies and Partnerships (key contact details at the end).

If potential exists to provide mitigation but timescales prevent this being fully resolved at this stage, other options should be considered for delivery through a dedicated landscape improvement fund secured through a legal agreement.

Landscape and Biodiversity Strategy (LABS)

I am satisfied that the Strategy outline is close to the points we discussed at the previous meeting to include:

- Clear aims and objectives for each area of reinstatement, mitigation and enhancement
- Commitment to detail, but try to keep the initial strategy at a higher level
- Provide justification for the offsite choices
- Consider context, networks and connectivity
- Appropriate emphasis on Landscape and Visual mitigation (to compliment ecology mitigation and reinstatement)

Additional to the wider effects, the proposals directly affect the operational site and contractors' accommodation area. While the exact detailed site design is still to be resolved, the design principles should be clearly set out in the LABS as guidelines for further detailed work to follow.

Landscape and Visual Baseline (see separate note on photographs below)

The Landscape and Visual Baseline is described in the ES Appendix 10.4 – Landscape and Visual Baseline. I am generally satisfied that this document describes the existing baseline for Landscape Character and Visual Amenity including the site and its immediate setting, the gas pipeline, local landscape designations, historic design of the Power Station and its landscape, heritage assets, ZTVs, primary viewpoints and visual receptors.

Photographs and Photomontages

The photographs and photomontages should be based on a good quality photographic image. Some of the photographs presented in the 'ES 10 – Landscape and Visual Amenity' lack clarity due to poor weather conditions at the time they were taken. Also, the photomontages tend to favour a narrow extent due to the angle of view.

Although several photographs are affected, as a minimum you may wish to re-consider the photographs used for viewpoints 6, 7, 8, and the possibility of a further photomontage at viewpoint 9 (PRoW close to Drax village).

Please contact me if you need any further information on the above.

John Wainwright
Principal Landscape Architect

Other Strategies and Partnerships (Contact details)

Leeds City Region Green Blue Infrastructure Strategy, 2010 (Updated 2017-2036)

Dales to Vale Rivers Network Catchment Partnership (<http://dvrn.co.uk/>)

Key Partners include:

- Selby District Council – Contact: Suzanne Sweeting, Partnerships Manager (01757 705101 ssweeting@selby.gov.uk)
- The West Yorkshire Combined Authority Board and Leeds City Region Enterprise Partnership Board – Contact: Noel Collings, Policy Officer (07870 996951 noel.collings@westyorks-ca.gov.uk)
- The Environment Agency – Contact: Claire Tunningley, EA Catchment Coordinator for the Ouse (07776 170320 claire.tunningley@environment-agency.gov.uk)
- Natural England – Contact: Tom Keetley (tom.keetley@naturalengland.org.uk)
- Yorkshire Wildlife Trust – Contact: Sara Robin, Conservation Officer (Planning) (01904 659570)
- Dales to Vale Rivers Network – Contact: Charlotte Simons, Senior Catchment Partnership Officer (07771 630029 charlotte.simons@ydrn.co.uk)

Internal Review:

Reviewed By:	Signature: Liz Small	Date: 23 July 2018
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